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Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

STACY SHANNON SHAW,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-01432-AC

STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME TO FILE THE
ELECTRONIC CERTIFIED
ADMINISTRATIVE RECORD AS THE
ANSWER TO PLAINTIFF'S COMPLAINT

Pending the Court's approval, the parties stipulate through their respective counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have a thirty-day extension of time to respond to Plaintiff's Complaint in this case from July 21, 2025, up to and including August 20, 2025. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due to be filed by July 21, 2025.

1 Defendant has not previously requested an extension of this deadline.

2 2. In accordance with the Federal Rules of Civil Procedures, recently amended to add
3 Supplemental Rules for Social Security review cases under 42 U.S.C. § 405(g), the
4 Commissioner files a certified administrative record (CAR) as the Answer to a
5 Complaint for review.
6

7 3. Counsel for the Commissioner has been informed by the client agency, which is the
8 Social Security Administration, Office of Appellate Operations, that the CAR is not
9 fully prepared in this matter. The client agency therefore needs more time to prepare
10 the CAR for the Court's review.

11 4. For this reason, Defendant requests an extension to August 20, 2025 (30 days), to file
12 an Answer or other response in this matter.
13

14 5. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
15 she has no objection to this extension request.
16

17 6. This request is made in good faith and is not intended to delay the proceedings in this
18 matter.

19 7. I am attempting to preserve limited judicial resources and have applied the most rapid
20 response under the circumstances.
21

22 WHEREFORE, Defendant requests until August 20, 2025, to respond to Plaintiff's
23 Complaint.

24 ///

Respectfully submitted,

DATE: July 14, 2025

/s/ Jesse S. Kaplan*
JESSE S. KAPLAN
Attorney for Plaintiff
(*as authorized via email on July 14, 2025)

MICHELE BECKWITH
Acting United States Attorney

MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration

DATE: July 14, 2025

By

s/ Justin L. Martin
JUSTIN L. MARTIN
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, it is so ordered.

DATE: July 14, 2025

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE